

**REMARKS**

**Claims 1-21 --- 35 U.S.C. § 112**

Claims 1-21 have been rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement with respect to the connecting portion being disposed on an outer surface of the housing. Applicant traverses this rejection.

The Examiner alleges that figure 3B in Applicant's specification shows the connecting portion being disposed between two inner walls of the housing. Applicant respectfully submits that the Examiner improperly construes the board 12 and connection terminals 14 as the connecting portion disposed on the other surface of the housing. As illustrated in Fig. 3B, the connecting portion 18 is formed at the proximal end of housing 11 and comprises a board side connecting portion 16 and a terminal side connecting portion 17 disposed on an outer surface of the housing. See, for example, page 6 of the specification. Thus, *with respect to the housing*, even when the connecting portion is sealed, the connecting portion is still disposed on the outer surface of the housing. Therefore, claims 1-21 comply with the written description requirement.

Further, in the Response to Arguments section of the Office Action, the Examiner states that since the claim is drawn to the final product of the connecting structure in which the connecting portion is sealed by a molded part, limitations drawn to the intermediate step when the connecting portion is exposed are given little patentable weight. Applicant has amended claim 4 to recite "a connecting portion," and submits that since even when the connecting portion is sealed, *with respect to the housing*, the connecting portion is still disposed on the outer surface. Therefore, the connecting portion as recited should be given patentable weight.

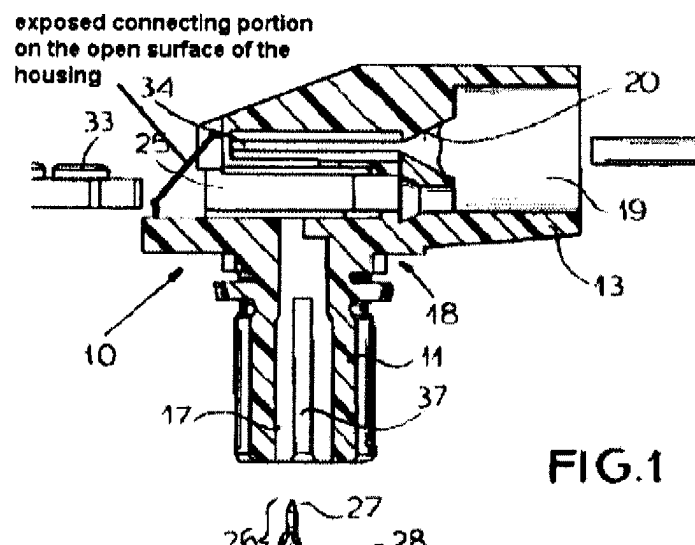
Accordingly, Applicant respectfully requests that the 35 U.S.C. § 112 rejection of claims 1-21 be withdrawn.

**Claims 1, 3, 7, 8, 10, 11, 13, 14, 19 and 20 --- 35 U.S.C. § 103(a)**

Independent claims 1 and 3, and dependent claims 7, 8, 10, 11, 13, 14, 16, 17, 19 and 20 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Guss in view of Fuchs. Applicant traverses this rejection.

The combination of Guss and Fuchs does not disclose or suggest at least a connecting portion disposed on an outer surface of said housing which connects said discrete connection terminal and at least one conductor of said flat cable, as recited in independent claim 1. The Examiner concedes that Guss fails to disclose or suggest at least these features. Fuchs does not cure the deficiencies of Guss.

The Examiner annotates and cites Fig. 1 of Fuchs (reproduced below from the Office Action) as allegedly disclosing the above-noted features.



Applicant notes, however, that the connecting portion of Fuchs which connects the discrete connection terminal and at least one conductor of the flat cable is described by element 34 rather than by the alleged exposed connecting portion identified by the Examiner.

As illustrated in Fig. 3 of Fuchs reproduced below, passages 34, which are formed internal to the body 18, accept the wires 14 which are subsequently pierced by the pointed tips 27 of the contacts 16 to form the connection between the contacts and the wires. The passages 34, therefore, are not on an outer surface of the housing but are formed internal to the housing. Thus, as illustrated in Fig. 3, even prior to installation of body 30 which covers the circuit board 22, the connecting portion of Fuchs which connects the discrete connection terminal to the cable is internal to the connector body and is not disposed on an outer surface of the housing as required by the claim.

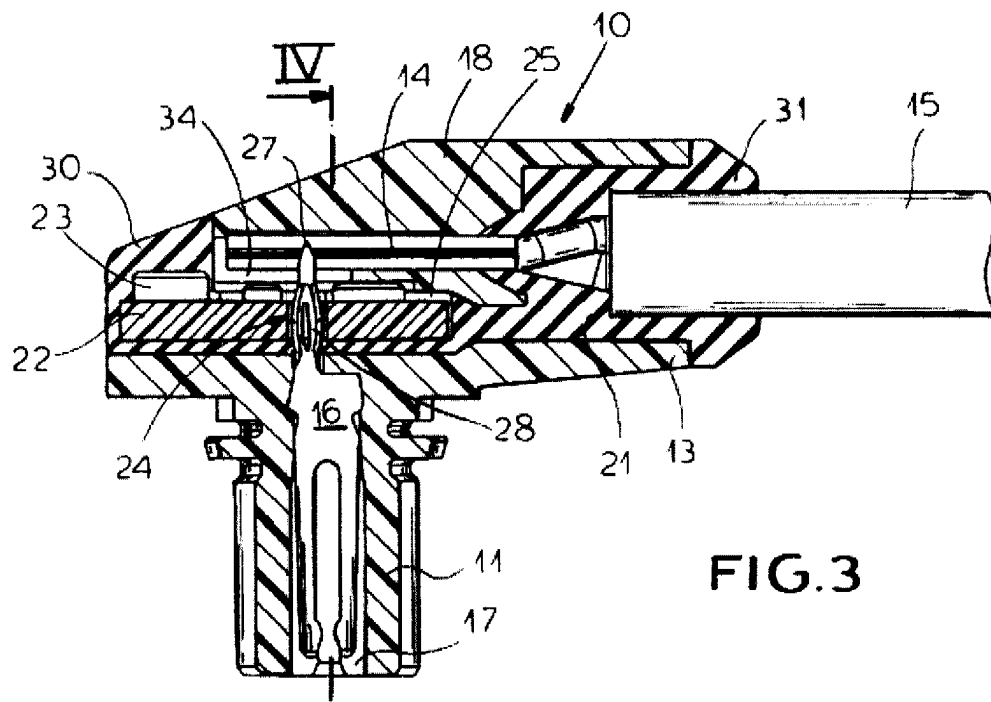
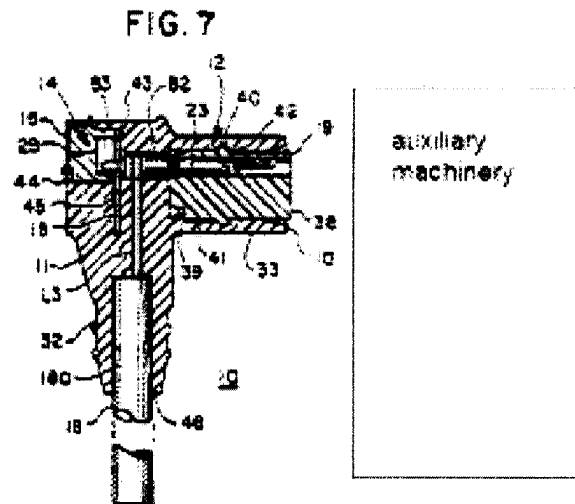
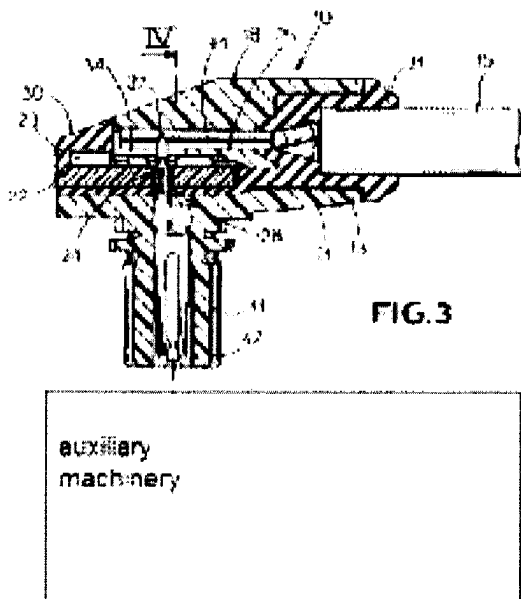


FIG.3

Therefore, Guss and Fuchs, either alone or in combination, do not disclose or suggest at least a connecting portion disposed on an outer surface of said housing which connects said discrete connection terminal and at least one conductor of said flat cable. Accordingly, even if one of ordinary skill in the art at the time the invention was made had been motivated to combine the references as attempted by the Examiner, the combination would still not result in all the claimed features. Therefore, claim 1 is patentable over the combination of Guss and Fuchs.

Claim 3 contains features similar to the features recited in claim 1 and is therefore patentable for similar reasons. Claims 7, 8, 10, 11, 13, 14, 16, 17, 19 and 20, which depend from one of claims 1 and 3, are patentable at least by virtue of their dependence.

With further regard to claim 1, in rejecting the claim the Examiner fails to address the features of a first portion of said flat cable which extends from said connecting portion is provided on and extends along an outer surface of said auxiliary machinery, as recited in the claim. In the Response to Arguments section of the Office Action, however, the Examiner alleges that "based on the right angle structures shown by Fuchs and Guss, after connection to the auxiliary machinery the cable will extend along an outer surface of the auxiliary machinery," as shown in the following illustration reproduced from the Office Action.



In rejecting the claims, the Examiner defined the auxiliary machinery allegedly disclosed in Guss (Fig. 7 above) as comprising a housing 11 which comprises a board 15 on which electronic components 26, 28 are mounted. In the Response to Arguments, the Examiner re-defined the auxiliary machinery as illustrated above as an element undisclosed by the references and entirely separate from the housing.

Applicant submits that the claims clearly recite that *the housing encloses the auxiliary machinery* and that one end of a discrete connection terminal connects to the circuitry pattern on the board and the other end of the discrete connection terminal connects to the cable.

Thus, claim 1 is patentable for at least these additional reasons.

**Claim 2 --- 35 U.S.C. § 103(a)**

Dependent claim 2 has been rejected under § 103(a) as allegedly being unpatentable over Guss and Fuchs, and further in view of Boyle. Applicant traverses this rejection.

The combination of Guss, Fuchs and Boyle does not disclose or suggest at least the above-noted features incorporated into claim 2 by virtue of its dependence from claim 1. As established above, the combination of Guss and Fuchs fails to disclose at least a connecting portion disposed on an outer surface of said housing which connects said discrete connection terminal and at least one conductor of said flat cable, as recited in the claim. Boyle does not cure the deficiencies of Guss and Fuchs.

As illustrated in Fig. 1, Boyle discloses a round multi-conductor cable which terminates in a connector assembly 14 after passing through a strain relief hood 18. Boyle clearly does not disclose or suggest the above-features deficient in the Guss-Fuchs combination. Therefore, even if one of ordinary skill in the art at the time the invention was made had been motivated to combine the references, the combination would still not result in the features claimed by Applicant.

Thus, claim 2 is patentable over the combined references.

**Claim 4 --- 35 U.S.C. § 103(a)**

Independent claim 4 has been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Guss and Fuchs, and further in view of Arnett. Applicant traverses this rejection.

The combination of Guss, Fuchs and Arnett does not disclose or suggest at least a connecting portion disposed on an outer surface of said housing which connects said discrete connection terminal and at least one conductor of said flat cable, as recited in the claim.

As established above in the arguments for claim 1, the combination of Guss and Fuchs fails to disclose or suggest at least these features. Arnett does not cure the deficiencies of the Guss-Fuchs combination. The Examiner relies on Arnett to allegedly disclose various mounting structures for the auxiliary machinery. Therefore, even if one of ordinary skill in the art at the time the invention was made had been motivated to combine the references as attempted by the Examiner, the combination would still not result in all the features claimed by Applicant.

Accordingly, claim 4 is patentable over the combination of Guss, Fuchs and Arnett.

**Claims 5, 6, 9, 12, 15, 18 and 21 --- 35 U.S.C. § 103(a)**

Dependent claims 5, 6, 9, 12, 15, 18 and 21 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Guss, Fuchs and Arnett, and further in view of Archer. Applicant traverses this rejection.

These dependent claims incorporate the features of claim 4 which, as established above, are not disclosed or suggested by the combination of Guss, Fuchs and Arnett. Archer does not cure these deficiencies. The Examiner relies on Archer to allegedly disclose an abutting portion in the form of a collar. However, Archer fails to disclose or suggest at least the features of a connecting portion disposed on an outer surface of said housing which connects said discrete connection terminal and at least one conductor of said flat cable, which are deficient in the Guss-Fuchs-Arnett combination.

In view of the above, even if one of ordinary skill in the art at the time the invention was made had been motivated to combine the references, the combination would not result in the

AMENDMENT UNDER 37 C.F.R. § 1.114(c)  
U.S. Application No.: 10/670,524

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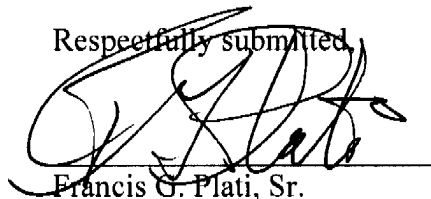
features as claimed. Therefore, dependent claims 5, 6, 9, 12, 15, 18 and 21 are patentable over the combination of Guss, Fuchs, Arnett and Archer.

### Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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